

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _PPA - 1

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Program Administration and Management

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|----------------------------|----------------------------|
| A. | Work-years of effort: | 5.0 |
| B. | Key responsible person(s): | Bob Hodanbosi/Cindy DeWulf |
| C. | Key responsible group: | Administration/Management |
| D. | Estimated total PPA costs | \$718,041 |

E. FFY'03 Status Narrative:

1. Ohio EPA is meeting the major requirements of the Clean Air Amendments and the grant commitments. A year-end progress report will be submitted by October 1, 2003.
2. LAA contracts for SFY 2002 (July 2001 through June 2002) were negotiated and executed by the July 1, 2002 deadline.
3. DAPC worked with U.S. EPA to provide financial management training for DAPC and LAA agency staff. The training was conducted by U.S. EPA staff.

F. FFY'04 Commitment Narrative

1. Ohio EPA will participate in negotiations with U.S. EPA and the Local Air Agencies to submit a final grant application. The Administration Section of DAPC will make FFY 2003 and 2004 amendment requests as necessary.
2. Ohio EPA will submit a comprehensive end-of-the-year progress report by November 1, 2004. The end of the year report will include a section on pollution prevention activities. We will notify U.S. EPA of any beneficial impact toward pollution prevention as a result of enforcement activities.

3. DAPC will submit a final 2003 Financial Status Report by December 31, 2004 and certify that CEL is met.
4. DAPC will implement MBE, WBE, and EEO.
5. DAPC will submit an FY2005 Section 105 Application by July 1, 2004 if the final national program guidance is available from US EPA by June 1, 2004.
6. DAPC will submit the final FY2003 Financial Status Report (FSR) or extension request by December 30, 2003. The FY2004 Financial Status Report (FSR) or extension request will be submitted by December 30, 2004.
7. DAPC will not supplant any non-Federal funds that would otherwise be available for maintaining the ongoing Section 105 supported program.

G. FFY'04 Resource Allocation

PPA-1 Program Administration and Management	
1) Salary, Fringe & Indirect Cost	\$444,312
2) Travel	\$991
3) Equipment	\$334
4) Supplies	\$3,108
5) Contractual	\$241,188
6) Other	\$28,108
7) Total	\$718,041

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _PPA - 2

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Attainment & Maintenance, Planning & Implementation for National Ambient Air Quality Standards

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|---------------------------------|--|
| A. | Work-years of effort: | 14.3 |
| B. | Key responsible person(s): | Mike Hopkins/Jim Orlemann |
| C. | Key responsible group: | Permitting/Enforcement and Compliance/Mobile Sources |
| D. | Estimated total PPA costs | \$2,053,597 |
| E. | FFY'03 Status Narrative: | |

SIP Revisions

The completeness and enforceability checklists were completed and submitted with SIP revisions.

Ozone SIP Development

1. Except for the NOx SIP Call rules, the activities regarding the continuation development and implementation of standards, plans, and actions to maintain air quality and developing regional NOx SIPs and 1-hr ozone SIPs where appropriate, are ongoing. The NOx SIP Call rules were adopted by the Director and submitted to U.S. EPA as a revision to the SIP for ozone.
2. The revisions to the VOC regulations (OAC Chapter 3745-21), which became effective on 6/15/99, have been submitted to US EPA for approval. This chapter is currently being reviewed and revised pursuant to Ohio's rule review requirements. Further revisions to OAC Chapter 3745-21 were adopted by the Director, as part of the Agency's rule review process, and will be submitted to the U.S. EPA as a revision to the SIP for ozone.

3. Ohio EPA and HAMCO have identified the sources and facilities in the Cincinnati nonattainment area affected by the RACT categories which were not implemented and were the basis for the Court ruling overturning the U.S. EPA approval of Ohio EPA's redesignation request for this area. Negative declarations have been submitted for three categories. PTI's, draft PTI's and draft Director's orders which address the remaining categories, have been shared with U.S. EPA.

Attainment Planning and Rule Development

1. The air quality data for the most recent three-year period has been reviewed to assess which monitors are measuring attainment or nonattainment for the one-hour and eight-hour ozone standard. The SO₂ data is being reviewed in several areas.

SO₂ SIP Development

1. Ohio EPA continues to implement the approved portions of the Ohio SO₂ SIP.
2. Ohio EPA worked with U.S. EPA on the redesignation of Cuyahoga and Lucas counties, including the resolution of Marsulex ambient impacts.
3. Ohio EPA worked with U.S. EPA to compare the state rules to the remaining Federal Implementation Plan (FIP) rules to assess what steps are needed to replace the remaining FIP rules with state rules.

Regional Haze

Ohio EPA has participated in several meetings with Midwest RPO.

Mobile Source Status Narrative.

1. The Stage II vapor recovery program continues to be implemented.
2. Ohio EPA continues to review and provide input to metropolitan planning organizations on conformity analysis and provide letters of comment to the U.S. EPA.
3. Ohio EPA continues to oversee an I/M program in the Cleveland/Akron, Dayton and Cincinnati areas.

CO SIP Development

1. Ohio EPA continues to implement the CO SIP.
2. Ohio EPA continues to review general agency conformity determinations and provide comments and/or concurrence.
3. Ohio EPA continues to review and provide input to metropolitan planning organizations on conformity analysis and provide letters of comment to U.S. EPA.

PM-10 SIP Development

1. U.S. EPA approved the redesignation requests for Cuyahoga and Jefferson Counties.
2. Ohio EPA submitted the 1/98 revisions to Ohio Administrative Code Chapter 3745-17 as a SIP revision. Further revisions to OAC Chapter 3745-17 were adopted by the Director, as part of the Agency's rule review process, and will be submitted to U.S. EPA as a revision to the SIP for PM10.

Acid Rain Coordination

1. Phase I and Phase II monitoring plans, certification test notices, and certification test results were reviewed for accuracy and completeness. Results of all reviews were forwarded with recommendations to U.S. EPA, Region V.
2. The Ohio EPA performed on-site observations in accordance with the CEM team agreement of continuous emission monitoring certification tests for Phase II facilities.
3. The Ohio EPA reviewed Phase II CEM certifications hard copy and stack test report results through independent verification of test results using raw data. All reviews were submitted to U.S. EPA, Region V.
4. Ohio EPA submitted a schedule for when the acid rain rules would be submitted to U. S. EPA. Ohio EPA did not complete the revision of the state regulations regarding the Phase II acid rain program. Ohio EPA will issue the final Phase II permits following the completion of these rules.

New Source Review PSD/NSPS/NESHAP

1. Ohio EPA has completed most of the improvements to the BACT/LEAR Clearinghouse. These efforts will be improved during FFY2004.

2. Ohio EPA has completed a basic NSR training program and a major NSR training program and has conducted training for all DO/LAA offices. Ohio EPA will schedule and hold either the basic NSR training or the major NSR training when demand is sufficient to justify a full class.

Lead SIP Development

1. Master Metals nonattainment was resolved a number of years ago. No nonattainment areas are currently known.

F. FFY'04 Commitment Narrative

Ozone SIP Development

1. Ohio EPA will respond to any proposals from U.S. EPA on the state/federal recommendations for ozone non-attainment areas.
2. Ohio EPA will conduct initial planning for the Section 110 SIPs for the 8-hour ozone standard in accordance with U.S. EPA's implementation schedule. Ohio EPA will stay informed of the activities of the U.S. EPA/STAPPA/ALAPCO workgroups and provide comments on the 8-hour implementation schedule once it is published in the Federal Register.
3. As resources allow, Ohio EPA will assess where voluntary ozone control measures make sense and commit to work with U.S. EPA, communities, and sources to implement voluntary control measures. Voluntary projects may include:
 - A. Discussions with potential new suppliers of lower sulfur diesel fuels to gauge their interest in supplying such fuels provided markets can be identified. These could include, but would not be limited to Marathon/Ashland refineries in Canton, Ohio and Ashland Kentucky, as well as BP in Lima and Toledo, and Sun in Toledo.
 - B. Diesel retrofit projects in each of Ohio's urban areas that may qualify under U.S. EPA's voluntary retrofit program;
 - C. Potential emission reductions from diesel fleets through the use of contract language for applicable construction projects and school bus contracts; and
 - D. Identifying other voluntary programs besides diesel work for early reductions for ozone and PM as well as air toxics.

4. Ohio EPA will continue to develop and implement standards, plans, and actions to maintain air quality and develop, where appropriate, regional NO_x SIPs and 1-hr ozone SIPs.
5. Ohio EPA will implement the requirements necessary to redesignate the Cincinnati area for the 1-hr ozone standard. The U.S. EPA had identified several source categories for which additional VOC emission limitations based on reasonably available control technology (RACT) may be needed. For any affected facilities, the additional RACT limitations will be specified in a Director's Order, a modified permit to install, or an OAC rule revision and then submitted to U.S. EPA as a revision to the ozone SIP.
6. The revisions of Chapter 3745-21 adopted by the Director during 2002 will be submitted to U.S. EPA for approval as part of the SIP for ozone.
7. Ohio EPA will complete U.S. EPA's Completeness and Enforceability checklists for all SIP submissions.
8. Ohio EPA will implement Phase II of the NO_x SIP Call in accordance with the schedule established by U.S. EPA.
9. Ohio EPA will discuss, plan and schedule the eighth-year maintenance plans with U.S. EPA.

PM-10 and PM-2.5 SIP Development

1. Ohio EPA will continue to develop and implement the standards, plans and strategies and take action to preserve air quality improvements already made.
2. Ohio EPA will develop an overall plan to address the new fine particulate standard in accordance with U.S. EPA's implementation plan. Ohio EPA will assess where voluntary PM_{2.5} controls measures make sense and work with EPA, communities, and sources to implement voluntary control measures.
3. The revisions of Chapter 3745-17 adopted by the Director during March 2003 will be submitted to U.S. EPA for approval as part of the SIP for PM₁₀.
4. Ohio EPA will respond to any proposals from U.S. EPA on the state/federal recommendations for PM_{2.5} non-attainment areas.
5. Ohio EPA will submit recommendations for PM_{2.5} nonattainment areas by February 15, 2004.

Mobile Source Program

1. Ohio EPA will continue to operate a centralized vehicle I/M program for the Cleveland/Akron, Dayton and Cincinnati areas.
2. Statewide anti-tampering law inspections and enforcement activities will continue.
3. Ohio EPA will continue to move forward to implement OBD by December 31, 2003. Ohio EPA will provide an implementation schedule to U.S. EPA.

Acid Rain

1. Ohio EPA will witness and review Phase I and Phase II recertification tests.
2. Ohio EPA will participate in the CEMS quality assurance RATA observations on a spot check basis only, observing RATA tests every 2-3 years.
3. Ohio EPA has revised the Acid Rain rules so Ohio now has the authority to issue Phase II acid rain permits. These rules became effective July 1, 2002. Ohio EPA submitted these rules to U.S. EPA for approval.
4. Ohio EPA will correct various minor errors in the Acid Rain rules by April 30, 2004.

Attainment, Planning & Rule Development

1. DAPC will work with the Office of Pollution Prevention on pollution prevention activities and studies.
2. Ohio EPA will review air quality monitoring data and prepare requests to redesignate to attainment or nonattainment as needed and appropriate.

CO SIP Development

1. Ohio EPA will continue to review general conformity determinations and provide comments and/or concurrence.
2. Ohio EPA will continue to review and provide input to metropolitan planning organizations on conformity analysis and provide letters of comment to U.S. EPA.
3. Ohio EPA will continue to review air quality information to assess whether redesignation to nonattainment is appropriate.

4. Ohio EPA will continue to complete U.S. EPA's Completeness and Enforceability checklists for all SIP revisions submitted to U.S. EPA.
5. Ohio EPA will continue to develop or revise SIPs as necessary to assure attainment.
6. Ohio EPA will discuss, plan and schedule the eighth-year maintenance plans with U.S. EPA.

SO2 SIP Development

1. Ohio EPA will continue to implement the approved portions of the Ohio EPA SO2 SIP .
2. Ohio EPA will develop SIPs that demonstrate attainment for new nonattainment areas with 18 months after redesignation.
3. Continue to develop or revise SIPs as necessary to assure attainment.
4. Ohio EPA will continue to work with US EPA to take appropriate steps with the aim of redesignating Cuyahoga and Lucas Counties to attainment. Ohio EPA will propose to revise the state emission limits to be consistent with the FIP limits by January 1, 2004.
5. Ohio EPA will develop technical support for the remaining FIP counties and propose rules by September 30, 2004.
6. Ohio EPA will submit an updated maintenance plan by September 30, 2004 for Washington/Morgan Counties.
7. Ohio EPA will discuss, plan and schedule the eighth-year maintenance plans with U.S. EPA. The outstanding redesignated counties will be identified and schedules determined by March 1, 2004.

Regional Haze

Ohio EPA will work with the Midwest RPO to begin to develop the technical information (modeling and emission inventory) to develop a SIP for regional haze. Ohio EPA will participate in the policy and technical committees as appropriate.

New Source Review PSD/NSPS/NESHAP

8. Ohio EPA will implement the delegation agreements for NSPS, MACT, and

NESHAPS and implement the SIP for PSD and major New Source Review.

9. Ohio EPA will provide opportunity for 30-day public comment period for all major sources, major modifications, netting sources, synthetic minors and controversial sources and sources covered by the NESHAPs (except those facilities covered under the dry-cleaning, the hard and decorative chrome electroplating and chromium anodizing tanks, the halogenated solvent cleaning, and the printing and publishing industry MACTs).

The following information will be submitted to U.S. EPA:

- a) For major NSR and PSD and netting permits submitted,
 - i. draft permit (transmitted electronically within 2 business days of issuance)
 - ii. technical support document (transmitted electronically within 2 business days of issuance of the draft permit)
 - iii. copy of application (hard copy mailed prior to issuance of the draft permit)
 - iv. final permit (transmitted electronically within 2 business days of issuance)
- b) For Synthetic Minor Sources
 - i. draft permit (transmitted electronically within 2 business days of issuance)
 - ii. technical support document (transmitted electronically within 2 business days of issuance of the draft permit)
 - iii. final permit (transmitted electronically within 2 business days of issuance)
- c) Controversial Sources
 - i. Items listed in a or b
 - ii. Response to comments document
 - iii. Notification of controversial sources through hearing notices transmitted electronically within 2 business days of the issuance of the notice
3. Ohio EPA will report to the BACT/LAER Clearinghouse any determinations.
4. Ohio EPA will modify programs as necessary to reflect changes made by U.S. EPA. In FY04 Ohio EPA will work on:
 - a) Permit Program Efficiency Committee efforts
 - i. General Permit rules and General permits for metal coating, concrete plants, roadways and parking areas, aggregate

- processing, perchloroethylene dry cleaners, gas/oil boilers, and asphalt plants
- ii. Permit-by-rules for gas fired boilers, gasoline dispensing facilities, auto body shops, storage tanks, and printing facilities
- iii. Permit exemption threshold changes to OAC 3745-31
- b) Planning rule changes to OAC 3745-31 to according to U.S. EPA's December 31, 2002 rule changes to 40 CFR 52.21.
- 5. Ohio EPA will conduct annual training for new permit staff. Ohio EPA will notify U.S. EPA of any scheduled training to allow for U.S. EPA's participation. Ohio EPA will notify U.S. EPA of any need for training.
- 6. Ohio EPA and U.S. EPA will communicate promptly regarding any Hot topics such as difficult applicability determinations and community issues. Regular communication on program and permit issues will also be maintained through the monthly program and NSR conference calls and the quarterly Region 5 State calls.

Lead SIP Development

Ohio EPA commits to monitor potential lead hot spots as necessary.

G. FY2004 Resource Allocation

PPA-2 Attainment & Maintenance, Planning & Implementation for National Ambient Air Quality Standards	
1) Salary, Fringe & Indirect Cost	\$1,270,733
2) Travel	\$2,834
3) Equipment	\$956
4) Supplies	\$8,888
5) Contractual	\$689,799
6) Other	\$80,388
7) Total	\$2,053,597

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _____ PPA - 3

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Air Toxics

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|----------------------------|--------------------------------|
| A. | Work-years of effort: | 4.0 |
| B. | Key responsible person(s): | <u>Mike Hopkins/Paul Koval</u> |
| C. | Key responsible group: | Permitting |
| D. | Estimated total PPA costs | \$574,433 |

E. FFY'03 Status Narrative:

1. Ohio EPA has continued to refer detailed indoor air questions to the Ohio Department of Health, who administers the indoor air program for Ohio.
2. Ohio EPA is working to obtain full delegation of the MACT program.
3. Ohio EPA, from Section 112 of the CAA, requested authority to implement and enforce selected air toxics programs and emission standards for all subject major and area sources. Ohio EPA is working with U.S. EPA to address U.S. EPA's comments.
4. Ohio EPA continues to coordinate the MACT standards through the MACT workgroup, which includes Ohio EPA Central Office, District Offices and Local Air Agencies. The workgroup addresses training and technical assistance. Ohio EPA participates in U.S. EPA MACT training as needed.
5. Ohio EPA is working with U.S. EPA as U.S. EPA establishes an air toxics monitoring program in Cleveland.
6. Ohio EPA has drafted the medical waste incinerator rules and continues to implement the medical waste combustor standard.
7. Ohio EPA continues to participate in calls and meetings concerning environmental assessments based on monitoring data and emission data.

8. Ohio EPA continues to participate in the Region V mercury conference calls.
9. Ohio EPA has requested emissions testing of metal processors in an effort to identify potential sources of mercury emissions.
10. Ohio EPA participated in the Cleveland air toxics pilot project.

F. FFY'04 Commitment Narrative

11. Ohio EPA will continue coordinating with the Ohio Department of Health to cooperate in the development and implementation of initiatives to address indoor air quality. Ohio EPA diligently informs citizens of indoor air information, provides information materials, and responds to citizen requests. Ohio EPA is providing assistance for special projects involving VOC sampling and risk analysis to the Ohio Department of Health and other Ohio EPA divisions as requested.
12. The Ohio EPA has not been and will not be delegated any authorities to regulate or enforce the Radionuclide NESHAPs found at 40 CFR 61, Subparts B, H, I, Q, R, T, or W.
13. Ohio EPA and U.S. EPA have signed the agreement to delegate authority for MACT standards to Ohio EPA. Ohio EPA will maintain an active MACT program in DAPC.
4. Ohio will enter data for any case-by-case MACT determinations into U.S. EPA's database following appropriate QA/QC protocol.
5. Ohio EPA will continue to participate in the review of Section 112(I)(5) (early reduction program for reducing air toxic emissions) proposals for facilities in Ohio.
6. Ohio EPA will continue to cooperate with U.S. EPA to assist in achieving the goal of reducing 75 percent of the incidence of cancer in urban areas from emissions of hazardous air pollutants from commercial and industrial sources by the year 2005.
7. Ohio EPA will coordinate with U.S. EPA, Region V and LAAs in educational efforts such as workshops, training, and technical assistance.
8. Ohio EPA will promote communication, coordination, and cooperation with all levels of government, the regulated community and the public. These activities include, for example, participation in the Residual Risk program rollout and

timely placement of Ohio EPA community risk assessment studies on the Ohio EPA website.

9. Ohio EPA will continue the air toxics monitoring program consistent with guidance to be provided by U.S. EPA. Data collected will be used to provide scientific underpinning to the assessment of residual risk of toxic species at specific source categories and to determine where additional toxic risks may be located. Ohio EPA will consult with U.S. EPA for other uses of data collected including possible development of ambient standards, appropriate notifications to the public and other actions.
10. Ohio EPA will continue the development of the commercial and industrial solid waste incinerator rules and SIP package in accordance with the following schedule:

12/10/02	Interested Party Review package went out to interested parties to solicit comments.
01/17/03	End of the comment period for the interested party review.
05/01/03	Final rule package begins sign-off chain.
06/01/03	Rules are filed with JCARR.
07/15/03	Official comment period expires.
08/15/03	Final-file rule package with JCARR.
10/15/03	Submit SIP package to Region V.
11. The small municipal waste combustor “no affected sources” determination has been submitted to U.S. EPA and was published in the Federal Register.
12. Ohio EPA will continue the development of the medical waste incinerator rules and SIP revision. The proposed rules were filed with JCARR on March 22, 2002.
13. Ohio EPA will continue to conduct environmental assessments based on monitoring data and emission data. Ohio EPA will assist U.S. EPA, as resources allow, to address concerns raised by NATA, with the understanding that NATA will not be used to direct the efforts of Ohio EPA’s air toxics program.
14. Ohio EPA will continue to participate in the Region 5 mercury conference calls.

15. Ohio EPA will identify potential sources of mercury emissions and request information from facilities with these sources. Ohio EPA will use orders to obtain this information as necessary. Ohio EPA will investigate methods to reduce point source mercury emissions to the atmosphere.
16. Ohio EPA will continue to develop a general permit program, which will include adopting rules for the issuance of general permits by June 1, 2003. Once these rules are effective, we will develop and implement procedures for the issuance of general permits including general permits for MACT area sources.
17. Ohio EPA will implement 112(j) in accordance with U.S. EPA's implementation schedule. Implementation will include reviewing Part I applications and conducting Part II outreach.
18. The Ohio EPA, Division of Air Pollution Control commits to providing a 1999 baseline area source air toxic inventory to U.S. EPA by December 1, 2002. This task will be accomplished by developing a toxic inventory for each area source category, importing the results into RAPIDS, doing any quality assurance / quality control necessary, using RAPIDS to export a file of this inventory and then uploading this file into U.S. EPA's National Emission Inventory (NEI).
19. Ohio EPA will consult with U.S. EPA to develop a method to routinely notify appropriate groups within Ohio EPA and U.S. EPA based upon concentrations above agreed on levels of concern for monitored toxic air pollutants.

G. FFY'04 Resource Allocation

PPA-3 Air Toxics	
1) Salary, Fringe & Indirect Cost	\$355,450
2) Travel	\$793
3) Equipment	\$267
4) Supplies	\$2486
5) Contractual	\$192,951
6) Other	\$22,486
7) Total	\$574,433

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _PPA - 4

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Enforcement and Compliance Program

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|----------------------------|--|
| A. | Work-years of effort: | 20.0 |
| B. | Key responsible person(s): | <u>Jim Orlemann/ Paul Koval</u> |
| C. | Key responsible group: | <u>Permitting/Enforcement and Compliance</u> |
| D. | Estimated total PPA costs | \$2,872,164 |

E. FFY '03 Narrative:

1. Inspection lists for the local air agencies (LAA) and the District Offices (DO) were submitted to U.S. EPA as part of the LAA contracts and DO work agreements. We are on schedule to meet our inspection commitments for the SFY.
2. The noncomplying facilities reports (NFRs) were submitted to U.S. EPA on a quarterly basis. Conference calls have been held with U.S. EPA, upon request, to provide updates concerning the SVLs. To the extent possible, Ohio EPA's air enforcement program has been implemented in accordance with U.S. EPA's guidance.
3. Asbestos samples were handled in accordance with U.S. EPA's guidance concerning chain of custody.
4. Ohio EPA developed and implemented the CETA program through which inspection and compliance data is submitted to the Air Facility System (AFS).
5. Ohio EPA has completed a procedures manual that explains how enforcement is accomplished in Ohio.

F. FFY'04 Commitment Narrative

1. Ohio EPA will conduct inspections of non-Title V facilities as resources allow. Ohio EPA will inspect and evaluate high priority facilities in accordance with the following schedule: 50% of the non-mega-site Title V facilities, 100% of the significant emission units at mega-site Title V facilities during the three year period beginning on October 1, 2002 and ending on September 30, 2005, and 20% of synthetic minor facilities. Every significant emissions unit at a Title V facility or non-registration emissions unit at a synthetic minor facility will be fully inspected and evaluated under the criteria of the CMS for a full compliance evaluation. (A full compliance evaluation includes an inspection of each emissions unit and a comprehensive evaluation of the compliance status of each and every term of the applicable PTI(s) and operating permit for the emission unit.) Insignificant activities at a High Priority facility or registration emissions units at a synthetic minor facility may or may not be fully evaluated at the inspector's discretion. Ohio EPA notes that the activities associated with the inspection of the Title V facilities under this goal for high priority facilities are not covered by this grant. The results of the inspections will be submitted to U.S. EPA using Ohio EPA's new compliance monitoring software, and will be reported in a format compatible with AFS.
2. A new inspection form and instructions has been developed by a work group comprised of staff from Central Office, District Offices, and local air agencies. U.S. EPA staff reviewed and commented on the draft inspection report and instructions. This new form and instructions will be used in FFY04.
3. A complete and accurate inventory will be maintained for all federally regulated sources. This information will be electronically transferred to AFS.
4. Information concerning inspections, compliance status, and enforcement information will be submitted to U.S. EPA on a monthly basis. Information on all newly identified sources will be submitted to U.S. EPA on a quarterly basis. At a minimum, this information will include the Airs Facility System Minimum Data Elements. Ohio EPA will work with U.S. EPA to create a summary report from CETA that will be submitted to U.S. EPA on a monthly basis.
5. Asbestos demo/reno sources and landfills will be inspected in accordance with the U.S. EPA's "Implementation Strategy for Revised Asbestos NESHAP" dated 1/91. All "top priority" jobs and all jobs involving citizen complaints will be inspected.

Records will be maintained to document the use of the asbestos targeting system. Each inspection will be conducted in accordance with the "Asbestos NESHAP Strategy." Notification information from the state will be submitted to U.S. EPA in ACTS format on a quarterly basis.

6. Data submitted by entities pursuant to federal regulations will be reviewed for completeness, accuracy, and compliance. Sources with delinquent or missing submissions will be identified in CETA. When appropriate, a written analysis of the review of each submission (except for asbestos demo/reno notices) will be prepared.

Within 120 dates following the promulgation of any NESHAP, a list of waiver requests and a report on the status of approval of each request will be submitted to U.S. EPA.

7. Copies of all CEM certification letters will be sent to U.S. EPA as they are issued. On a quarterly basis, summaries of all EER and FSA reports will be submitted to U.S. EPA on a 3.5" diskette, along with copies of any CEM quality assurance reports. When feasible, these reports will be transferred to U.S. EPA electronically.
8. As resources permit, the DAPC will attempt to conduct its enforcement activities in accordance with the "Policy on Timely & Appropriate Enforcement Response to High Priority Violations (HPVs)" and the "Revised Asbestos NESHAP Strategy" and try to address State lead significant violators within 270 days. Ohio EPA will be responsible for inputting state enforcement data into AFS.

Conference calls will be held with U.S. EPA to discuss the States' efforts to resolve the known violators. During these conference calls, newly discovered violators will be identified, and we will be prepared to discuss the date, case lead, evidence, time line for resolution, the status of cases subject to State agreements deferred to by the U.S. EPA, SEP project information for purposes of measuring pollution prevention and injunctive and penalty relief, which collects at least the economic benefit, or utilizes the principles of the Supplemental Enforcement Project (SEP) Policy dated 1/1/91.

Ohio EPA will submit copies of NOV's and warning letters for HPVs as violations are discovered .

Copies of all DWLs and F&Os will be sent to the U.S. EPA along with the minutes of the EC meetings. Consent Decrees/Orders will also be submitted shortly after signature by the judge. Draft penalty calculations for F&O's will routinely be provided with the EC minutes. The penalty calculations associated with Consent Decrees/Orders will be provided upon request and only with the approval of the Assistant Attorney General(s) working on the case.

9. The DAPC will continue, upon request, to work with U.S. EPA in the development of enforcement cases for which the U.S. EPA has the lead role.

10. The analysis of asbestos samples by a private contractor will continue to be handled in accordance with U.S. EPA's guidance. The Analysis Report will be obtained from the contractor once the analysis is completed.
11. The DAPC will work with U.S. EPA staff on the U.S. EPA "ECHO" project as resources (i.e., monies and personnel) allow.
12. If resources allow, DAPC staff will request permission from DAPC management and the Director to send one representative to the national AFS conference.

G. FFY'04 Resource Allocation

PPA-4 Compliance Program	
1) Salary, Fringe & Indirect Cost	\$1,777,248
2) Travel	\$3,964
3) Equipment	\$1,337
4) Supplies	\$12,431
5) Contractual	\$964,753
6) Other	\$112,431
7) Total	\$2,872,164

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _PPA - 5

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Air Quality Monitoring

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|---------------------------------|-----------------------|
| A. | Work-years of effort: | 10 |
| B. | Key responsible person(s): | <u>Randy Hock</u> |
| C. | Key responsible group: | <u>Air Monitoring</u> |
| D. | Estimated total PPA costs | \$1,436,082 |
| E. | FFY'03 Status Narrative: | |

Operation of Ambient Air Monitoring Network

1. Ohio EPA continues to operate an air quality monitoring network according to the regulations specified in Title 40 Code of Federal Regulations Part 58, and also with U.S. EPA's guidelines.
2. Ohio EPA makes periodic updates to the AQS site file database. Appendix E's are sent to U.S. EPA each year.
3. Ohio EPA notifies Region V when changes are made to the network.
4. The annual age survey was completed.
5. Monitoring specifications are sent to Region V for review before they are used.
6. Ohio EPA completed the network review before October 2001.
7. Ohio EPA reviewed Appendix E, the list of monitoring sites. This was made part of the LAA contracts.

Data Management: Data Management

1. The capture rate of each reporting organization is reviewed each month. Those who are not meeting the minimum requirements are informed of that fact through the DAPC monthly report.
2. The site file is updated on a regular basis, as needed. We are scrupulous about adding monitor and site ending dates to the site file. Copies of the site file are sent to each local air agency and district office at least once a year for their review. Periodically we target specific data fields for review.
3. U. S. EPA, Region V is informed of all exceedances of the NAAQS. Ohio EPA, DAPC responds to Region V's exceedance report when sent.
4. The SLAMS Report is being completed. The ambient data has been validated. The report was submitted in December for the ambient data. The QA data has not yet been validated. DAPC continues to work on the QA data.
5. Based on budgetary concerns, DAPC staff may not be able to attend the AQS User Conference.
6. Ohio EPA submits validated, edited ambient monitoring data into AQS within 90 days of the end of the quarter. If the data has not been submitted, Ohio EPA Central Office notifies the LAA or DO through a memo and monthly report when data are late or missing.
7. Ohio EPA, through monitoring personnel at Central Office, district offices, local air agencies and industries continue to perform all required precision and accuracy checks.

Quality Assurance

1. The program for reviewing district offices and local air agencies ambient air monitoring and quality assurance activities was revised according to federal guidance. The Canton Agency was reviewed in October 2002. The Cleveland Air Agency was reviewed in July 2003. All state and local reporting organizations participate in Region V interlaboratory surveys for those pollutants that are offered and for which the agency monitors.
2. DAPC completed its primary ozone standard certification with the Region 5 primary standard in November 2002 and is completing verification with local agency standards during February and March 2003.
3. The Ohio EPA Quality Assurance Auditors conduct instrument performance audits according to federal guidance. State QA auditors conduct instrument

performance audits at state, local, and industrial monitoring networks as required.

4. DAPC reviews industrial monitoring QA project plans and revisions as per 40 CFR 58, Appendix B. No new industrial plans were reviewed during this period.
5. DAPC ensures that all quality assurance audit equipment is up-to-date, calibrated, and certified to NIST standards and in good working order.
6. DAPC ensures that all ozone calibration Standard Operating Procedures (SOP's) follow the Federal Guidelines.
7. DAPC ensures that quality assurance audit equipment is replaced as age or lack of accuracy or performance requires it.
8. Ohio EPA participates in the National Performance Audit Program offered by the Office of Air Quality Performance Standards and the Region 5 inter-laboratory surveys for all criteria pollutants if U.S. EPA separately funds these services.
9. Ohio EPA ensures all ambient monitoring sites have the required amount of precision and accuracy checks in accordance with 40 CFR Part 58, Appendix A. No local air agency or district office has commented that NPAP audit standards were sent to them this year.
10. Ohio EPA ensures precision and accuracy data for criteria pollutants are submitted to the AQS database as stipulated in 40 CFR Part 57.35. Significant problems were encountered entering new data into the re-engineered AQS system this year. However, extensive work with the precision and accuracy database during January and February 2003 has resulted in successfully loading precision and accuracy data of all for 2001 and 2002 into the system. A letter certifying the data will be sent to Region 5.

Air Monitoring - Urban Air Toxics

1. Most of the metals data collected and analyzed through 2002 has been submitted to AQS as routine monthly composite sampling data.
2. Air toxics VOC data has been compiled through most of 2002 and has been updated into the new AQS. By the end of FFY'2003, all available 2000 - 2003 VOC data from the routine AQS that meet all requirements will be available in the U.S. EPA Air Quality System database.
3. During 2002 all metals sites were subjected to increased metals sampling. Samples collected from all sites were analyzed for a suite of eight metals which included all the HAPS metals except for mercury. Sampling was conducted on a one in 6 day sampling schedule with the samples composited into monthly

samples. This is expected to continue for all metals sites that remain active.

4. Two new routine sampling sites were established in 2003.
5. The current Ohio EPA Air Toxics Network will be reassessed in 2003. At least 1 new site will be added, with sampling resources from one or two other sites moved to new locations.
6. The major metropolitan areas of Cincinnati and Cleveland have extensive urban air toxics monitoring efforts currently underway. During 2003, at least one VOC sampling will be established in the Columbus area.

E. FFY'04 Commitment Narrative

Operation of Ambient Air Monitoring Network

1. Ohio EPA operates a comprehensive air quality monitoring network in accordance with the regulations specified in Title 40 Code of Federal Regulations (CFR) Part 58, as well as with U.S. EPA guidelines.
2. We make routine updates to the AQS database site file that includes adding monitor and site termination dates. These data are available to Region V for retrieval. In addition, Appendix E, a list of monitoring sites, is revised each summer and becomes a part of our grant package. We expect to have a draft available in June and a final by late summer 2003. Copies will be sent to Region V and to the NAMS coordinator in RTP.
3. Changes to the network are, and will be, sent to Region V as they occur. DAPC will submit ambient air quality and precision and accuracy data into AQS as required by 40 CFR 58. Ohio EPA will complete all phases of a network review regarding criteria pollutants and fine Particulate Matter (PM_{2.5}). The State will submit their review to U.S. EPA annually by December 1.
4. The annual monitor age survey will be done this winter with a draft available by February. The results of the survey will be used to determine which monitors the local air agencies are required to purchase in the next contract year.
5. Monitoring equipment specifications are required to be sent to Region V for review before they are used. All local air agencies are informed of this requirement.
6. DAPC will publish an annual air quality report within eight months of the end of the calendar year.
7. Ohio EPA will keep Region V informed of any network changes by submitting to

U.S. EPA Region 5 on October 1, 2003, the annual Network Review document for the criteria pollutants. The review will address current and proposed changes to the State's network. Ohio EPA will address U.S. EPA's comments and implement changes agreed upon within a year.

8. Ohio EPA will revise annually Appendix E, a list of monitoring sites. A draft will be submitted in October and a final by late fall 2003. Copies will be sent to Region 5 and the U.S. EPA's National Air Monitoring System (NAMS) coordinator in Research Triangle Park.

Data Management

1. DAPC will continue to track data completeness on a monthly basis. The reporting organizations are reminded that the minimum data capture is 75%.
2. DAPC will submit site information to AQS as it is received from the reporting organizations. In addition, DAPC will periodically review the data that is in the system for accuracy. Once a year or more, at their request, the reporting organizations will receive a copy of their site file to check for accuracy and to make changes.
3. DAPC will ensure that state district offices and local air agencies work to obtain the precision and accuracy goals for 95% probability limits as follows: ± 15.0 for accuracy for manual methods (PM₁₀, TSP, Pb), ± 15.0 for precision for all parameters and ± 20.0 for continuous methods as determined at audit level two only.
4. Ohio EPA will report exceedances of the National Ambient Air Quality Standards (NAAQS) to U.S. EPA on a quarterly basis. Ozone exceedances should be reported on an as-they-occur basis.
5. The annual SLAMS Summary Report will be sent to Region V, with copies to RPT in June of each year in order to make the July 1 deadline. Ohio EPA will notify Region 5 if we have difficulty meeting this deadline.
6. DAPC staff will request permission from DAPC management and the Director's Office to send one representative to the AQS conference.
7. Ohio EPA will submit validated, edited ambient monitoring data into AQS within 90 days of the conclusion of the quarter.
8. Ohio EPA will submit precision and accuracy data into AQS as required by 40 CFR Part 58.

Quality Assurance

1. DAPC will perform a periodic review of the State District Offices and Local Air Agencies and their QA programs. DAPC will submit QA program plan revisions to U.S. EPA for approval.
2. DAPC will participate in AREAL and Region 5 interlaboratory surveys for all criteria pollutants that are offered.
3. DAPC will participate in the Region 5 ozone certification/verification program for the state and local air agencies that monitor for ozone.
4. DAPC will ensure that all reporting organizations (state, local, and industrial) conduct performance audits as per the approved QA plan.
5. DAPC will review industrial monitoring QA project plans and revisions as per 40 CRF 58, Appendix B.
6. DAPC will ensure that all quality assurance audit equipment is up-to-date, calibrated, certified to NIST standards and in good working order. DAPC will ensure that all quality assurance audit equipment is replaced as age or lack of accuracy or performance requires it.
7. DAPC will ensure that all ozone calibration Standard Operating Procedures (SOP's) follow the Federal Guidelines.
8. Ohio EPA will continue to monitor and maintain sufficient monitoring staffing levels at Ohio EPA district offices.
9. Ohio EPA commits to participate in the National Performance Audit Program offered by the Office of Air Quality Performance Standards and the Region 5 inter-laboratory surveys for all criteria pollutants if U.S. EPA separately funds these services.
10. Ohio EPA will ensure that all ambient monitoring sites have the required amount of precision and accuracy checks in accordance with 40 CFR Part 58, Appendix A.
11. Ohio EPA will ensure precision and accuracy data for criteria pollutants are submitted to the AQS database as stipulated in 40 CFR Part 57.35

Air Monitoring - Urban Air Toxics

1. Ohio EPA is now submitting data collected from urban air toxics sites routinely into AQS. Ohio EPA will continue to submit volatile organic compound and

metals data into AQS on a routine schedule.

2. Two new sampling sites will be established in 2003 for VOC HAPs sampling network. Sampling will be conducted on a one in 12 day sampling schedule. Metals sampling for the suite of eight heavy metals excluding mercury will continue at sites that remain active. No new AQS metals sites are currently anticipated, although resources may be moved to other locations.
3. As time and resources allow, Ohio EPA will be identifying and prioritizing locations and sites for future air toxics monitoring/sampling efforts that compliment to the current U.S. EPA Air Toxics Strategy.

G. FFY'04 Resource Allocation

PPA-5 Air Quality Monitoring	
1) Salary, Fringe & Indirect Cost	\$888,625
2) Travel	\$1,982
3) Equipment	\$668
4) Supplies	\$6,215
5) Contractual	\$482,377
6) Other	\$56,215
7) Total	\$1,436,082

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _PPA - 6

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Point Source Emissions Data

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|----------------------------|---------------------------------|
| A. | Work-years of effort: | 3.0 |
| B. | Key responsible person(s): | <u>Mike Hopkins/Tom Velalis</u> |
| C. | Key responsible group: | <u>Permitting</u> |
| D. | Estimated total PPA costs | \$430,825 |

E. FFY'03 Status Narrative:

1. Ohio collected the 2001 facility emission inventory data and the data currently undergoing review by district and local agency personnel. Ohio EPA is expecting to meet its inventory obligation and submit a type A sources inventory by U.S. EPA's deadline.

F. FFY'04 Commitment Narrative

1. Ohio EPA will collect the 2002 point source criteria emissions data from the sources meeting the criteria of the Consolidated Emissions Reporting Rules by April 15, 2004, quality assure the information and prepare the type B source inventory for submission to U.S. EPA by June 1, 2004.
2. Ohio EPA will work closely with Region V and NEI to evaluate the feasibility of producing a point source toxics inventory for inventory year 2002.
3. Ohio EPA will compile the 2002 area source emissions data (for selected categories of toxics) and submit the data into NEI every three years.
4. Depending on resources available, Ohio EPA will either compile the 2002 mobile source emissions data and submit 2002 and every three years thereafter into NEI or review the U.S. EPA's Mobile 6 estimate of Ohio's emissions and provide comment.

G. FFY'04 Resource Allocation

PPA-6 Point Source Emissions Data	
1) Salary, Fringe & Indirect Cost	\$266,587
2) Travel	\$595
3) Equipment	\$201
4) Supplies	\$1,865
5) Contractual	\$144,713
6) Other	\$16,865
7) Total	\$430,825

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _PPA - 7

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Great Lakes Air Toxics Deposition

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|----------------------------|--------------------------------|
| A. | Work-years of effort: | 0.5 |
| B. | Key responsible person(s): | <u>Mike Hopkins/Paul Koval</u> |
| C. | Key responsible group: | <u>Permitting</u> |
| D. | Estimated total PPA costs | \$71,804 |

E. FFY'03 Status Narrative:

1. Ohio EPA participated on the conference calls pertaining to the review of toxic emissions in the eight Great Lake States.
2. Ohio EPA participated in assessing air emission issues associated with Remedial Action Plans, specifically the Marion Schools project.
3. Ohio EPA continued efforts to reduce HAPs through its mercury project.
4. Ohio EPA does not currently operate any samplers that are sited for providing supplemental data for the integrated atmospheric deposition network. However, data from samplers in Cuyahoga and Lake counties will be available from 2000.
5. Ohio EPA continued to participate in the Great Lakes Toxics conference calls.

F. FFY'04 Commitment Narrative

1. Ohio EPA will continue Lake Erie program activities as necessary.
2. Ohio EPA will continue to participate in assessing air emission issues associated with remedial actions.
3. Ohio EPA will continue efforts to reduce HAP emissions.

4. Ohio EPA will operate monitors, where appropriate, to provide data to supplement the integrated atmospheric deposition network. If additional funding becomes available, Ohio EPA may site and operate two atmospheric deposition sites as part of the Council of Great Lakes Governors efforts to improve the quality of the Great Lakes.
5. Ohio EPA will continue to participate in U.S. EPA Great Lakes conference calls, and continue to help select grant recipients for Section 105 specific studies.
6. Ohio EPA will work jointly and cooperatively with Region 5 and other Great Lakes States to develop a multi-year plan for atmospheric deposition to ensure effective and efficient expenditure of Great Lakes air deposition funds.
7. Ohio EPA will continue to review and comment on activities developed as a result of the Lake Erie LaMP and national program activities.
8. Ohio EPA DAPC will provide support, as appropriate, Ohio EPA Division of Surface Water as they address issues associated with Total Maximum Daily Loads (TMDLs) and atmospheric deposition.

G. FFY'04 Resource Allocation

PPA-7 Great Lakes Air Toxics Deposition	
1) Salary, Fringe & Indirect Cost	\$44,431
2) Travel	\$99
3) Equipment	\$33
4) Supplies	\$311
5) Contractual	\$24,119
6) Other	\$2,811
7) Total	\$71,804

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _PPA - 8

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Geographic Initiatives

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|----------------------------|--|
| A. | Work-years of effort: | 0.5 |
| B. | Key responsible person(s): | <u>Mike Hopkins/Randy Hock/ Paul Koval</u> |
| C. | Key responsible group: | <u>Permitting/Air Monitoring</u> |
| D. | Estimated total PPA costs | \$71,804 |

E. FFY'03 Status Narrative:

Ohio EPA has participated in the geographic initiative in the tri-state area. Modeling and risk assessment projects have been completed for the first two clusters. Ohio EPA continues to review and provide comments on project reports.

F. FFY'04 Commitment Narrative

Ohio EPA will continue to participate in the geographic initiative with Regions III, IV and V, and Ohio, W. Va, and Kentucky. Ohio EPA will assist U.S. EPA in developing the monitoring, modeling, and the risk assessment reports for the Tri-State Geographic Initiative for additional clusters if the project continues.

G. FFY'04 Resource Allocation

PPA-8 Geographic Initiatives	
1) Salary, Fringe & Indirect Cost	\$44,431
2) Travel	\$99
3) Equipment	\$33
4) Supplies	\$311
5) Contractual	\$24,119
6) Other	\$2,811
7) Total	\$71,804

PROJECTION PROGRAM ACCOMPLISHMENT (PPA) DESCRIPTION FORM

Agency: _____ Ohio EPA

Date: _____ September 2003

Program Category: _PPA - 9

Note: The information record below is for planning purposes only and not subject to audit.

PPA Title: _____ Global Atmosphere

Projected Status at end of FFY'03

Planned Commitment for FFY'04

- | | | |
|----|----------------------------|---------------------------|
| A. | Work-years of effort: | 0.3 |
| B. | Key responsible person(s): | <u>Bill Spires</u> |
| C. | Key responsible group: | <u>Permitting Section</u> |
| D. | Estimated total PPA costs | \$43,082 |

E. FFY'03 Status Narrative:

Ohio EPA continued to provide Title VI information to affected parties. Ohio EPA continues to participate in activities within Ohio that deal with environmental impacts of ozone depleting substances and technologies that impact the release of global warming emissions.

F. FFY'04 Commitment Narrative

1. Ohio EPA will continue to participate in activities such as education/outreach on stratospheric ozone, Title VI, and/or climate change.
2. Ohio EPA will continue to provide Title VI information to affected parties. Ohio EPA continues to participate in activities within Ohio that deal with environmental impacts of ozone depleting substances and technologies that impact the release of global warming emissions.

G. FFY'04 Resource Allocation

PPA-9 Global Atmosphere	
1) Salary, Fringe & Indirect Cost	\$26,659
2) Travel	\$59
3) Equipment	\$20
4) Supplies	\$186
5) Contractual	\$14,471
6) Other	\$1,686
7) Total	\$43,082